

COMPILED COMMENTS ON CLH CONSULTATION

Comments provided during consultation are made available in the table below as submitted through the web form. Please note that the comments displayed below may have been accompanied by attachments which are listed in this table and included in a zip file if non-confidential. Journal articles are not confidential; however they are not published on the website due to Intellectual Property Rights.

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Last data extracted on 10.05.2023

Substance name: potassium pentaborate

CAS number: 11128-29-3

EC number: 234-371-7

Dossier submitter: Sweden

GENERAL COMMENTS

Date	Country	Organisation	Type of Organisation	Comment number
20.04.2023	Germany		MemberState	1
Comment received				
In Table 7, only the d50 value is given under Granulometry. Since the values for d10 and d90 are also available from the REACH data, they should also be included here.				

TOXICITY TO REPRODUCTION

Date	Country	Organisation	Type of Organisation	Comment number
20.04.2023	Germany		MemberState	2
Comment received				
Fertility				
The proposed classification of potassium pentaborate as Repr. 1B, H360F with a GCL due to medium potency is supported.				
No studies with potassium pentaborate itself are available. Available read-across studies for this endpoint include studies with boric acid and disodium tetraborate decahydrate (borax), both already classified as Repr. 1B, H360FD. The studies in different species indicate that boron severely impairs sexual function and fertility predominantly through an effect on the testes (e.g. testes atrophy, reduced sperm count, viability and motility).				
In addition, studies that are more recent confirm these effects. The available human data, which do not show adverse effects, do not contradict the animal data, because the daily exposure to boron was far below the NOAEL/LOAEL in animal studies.				
Development				
The proposed classification of potassium pentaborate as Repr. 1B, H360D with a GCL due to medium potency is supported.				
As with the fertility endpoint, no studies with potassium pentaborate itself are available. The				

classification is solely based on the read-across to boric acid and borax. These substances induced developmental abnormalities (malformations) in different species and are already classified as Repr. 1B, H360D.

A recent PNDT study with boric acid (Pleus, 2018) showed a reduction in mean foetal body weight. However, this study has only been evaluated as an additional study. The doses resulting in significant lower foetal weights are below the LOAEL for developmental abnormalities observed in other studies.

Therefore, criteria for classification of potassium pentaborate as Repr. 1B, H360FD are considered fulfilled.

The GCL of 0.3 % is based on read-across from boric acid (lowest ED10/LOAEL) and adjusted for boron equivalents.

In addition, there is agreement with no classification for adverse effects on or via lactation.

Date	Country	Organisation	Type of Organisation	Comment number
05.05.2023	Belgium	European Borates Association	Industry or trade association	3
Comment received				
<p>The European Borates Association (EBA) accepts that there is a reproductive effect of certain boron compounds in laboratory animals under test conditions and that read across between boric acid and the substance is applicable. However, the EBA questions the relevancy of these data to consider the substance as meeting the classification and labelling criteria of Category 1B as is proposed in this CLH Report. The EBA is of the view that a Repr. Category 2 H361d classification is more justified than a Category 1B H 360 FD. Secondly, the CLP Regulation provides that weight of evidence should be used to determine the category of classification, and this evaluation is missing from the CLH Report. Finally, we agree with the proposal from the Dossier Submitter to assign the note 11 (additivity note) to the substance.</p> <p>See the attachment for more detailed comments</p> <p>ECHA note – An attachment was submitted with the comment above. Refer to public attachment EBA comments on 10 CLH boron compounds.pdf</p>				

PUBLIC ATTACHMENTS

1. EBA comments on 10 CLH boron compounds.pdf [Please refer to comment No. 3]